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20 *Attorneys for Defendants*

21 **IN THE UNITED STATES DISTRICT COURT**

22 **FOR THE DISTRICT OF ARIZONA**

23 Jason Crews,

24 Plaintiff,

25 v.

26 First Family Insurance, LLC and John
27 Cosgriff,

28 Defendants.

No. 2:24-cv-00366-CDB

**DECLARATION OF
JOHN BLANCHARD**

Pursuant to 28 U.S.C. §1746, I, John Blanchard, declare as follows:

1. My name is John Blanchard. I am the Vice President of Sales at First Family Insurance, LLC ("First Family"). I am over 18 years of age. I suffer no mental disabilities and am otherwise competent to make this Declaration. I have personal knowledge of the information

1 contained in this Declaration or obtained the information through a review of the corporate books
2 and records of First Family.

3 2. First Family was organized under the laws of the State of Florida on September 3,
4 2020, and since that date has remained a Florida registered limited liability company domiciled
5 in the State of Florida.

6 3. At all times, First Family's principal place of business has been located in Fort
7 Myers, Florida.

8 4. At no time has First Family ever been registered in the state of Arizona as a
9 domestic or foreign corporation.

10 5. First Family has not consented to the jurisdiction of the Arizona state or federal
11 courts, and has not otherwise consented or agreed to be sued in any courts located in the State of
12 Arizona including this Court

13 6. First Family keeps records of all telephone solicitations that it has placed or
14 initiated. I have reviewed those records, and can confirm that First Family has no record of
15 placing or initiating a telephone call to the Plaintiff, including the telephone number 602-295-
16 1875. If First Family had done so, it would be reflected in the records. Accordingly, First Family
17 never placed or initiated a telephone call to Plaintiff or his telephone number 602-295-1875.

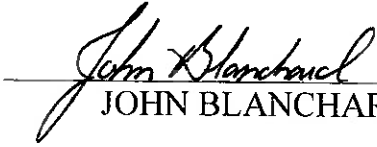
18 7. First Family has never authorized, directed, controlled, or caused any third party to
19 place or initiate a telephone call to the Plaintiff.

20 8. Moreover, First Family has never authorized, directed, controlled, or caused any
21 third party to place or initiate a telephone call to the Plaintiff that would violate the Telephone
22 Consumer Protection Act, 47 U.S.C. § 227 ("TCPA"), or the Florida Telephone Solicitation Act,
23 Fla. Stat. § 501.059 ("FTSA"). To the contrary, First Family requires that all such persons who
24 seek to contract with First Family, including independent contractor insurance advisors such as
25 Ryan Lopez, represent and agree that their insurance marketing and advertising activities will be
26 in compliance with all applicable federal and state laws, which includes the TCPA and FTSA.

27
28 [signature appears on following page]

1 I declare under penalty of perjury that the foregoing is true and correct.

2
3 Dated: May 9, 2024


JOHN BLANCHARD